

### REMARKS

This is a full and timely response to the outstanding final Office Action mailed July 26, 2006. Claims 1-7 and 11-12 remain pending in the present application. Reconsideration and allowance of the application and pending claims are respectfully requested.

#### Response to Rejections of Claims under 35 U.S.C. § 102

Claims 1-7 and 11-12 have been rejected under 35 U.S.C. § 102(e) as being anticipated by *Verhoest* (U.S. Patent No. 6,588,954). Applicant respectfully traverses this rejection.

It is axiomatic that "[a]nticipation requires the disclosure in a single prior art reference of each element of the claim under consideration." *W. L. Gore & Associates, Inc. v. Garlock, Inc.*, 721 F.2d 1540, 1554, 220 USPQ 303, 313 (Fed. Cir. 1983). Therefore, every claimed feature of the claimed subject matter must be represented in the applied reference to constitute a proper rejection under 35 U.S.C. § 102(e). In the present case, not every feature of the claimed subject matter is represented in the *Verhoest* reference. Applicant discusses the *Verhoest* reference and Applicant's claims in the following.

#### a. Claim 1

As provided in independent claim 1, Applicant claims:

A device to hold a flexible substrate to be printed upon, the device comprising:

a static support structure; and

***elongated support units, each has a bottom surface supported by said support structure, wherein said units are positioned remote from and substantially parallel to each other such that top surfaces of said units delineate a substantially convex profile in a plane perpendicular to a longitudinal axis of said units;*** and

a tensioning device integral to a feed and take-up device capable of moving said flexible substrate across said the support structure.

(Emphasis added).

Applicant respectfully submits that independent claim 1 is allowable for at least the reason that *Verhoest* does not disclose, teach, or suggest at least "elongated support units, each has a bottom surface supported by said support

structure, wherein said units are positioned remote from and substantially parallel to each other such that top surfaces of said units delineate a substantially convex profile in a plane perpendicular to a longitudinal axis of said units," as recited and emphasized above in claim 1.

Rather, *Verhoest* appears to disclose at most a printing system having supports 25a, 25b, 25c, 25d attached to support frame 26. Each support is connected to a coupling means 23a, 23b, 23c, and 23d used for securing rollers (21a, 22a), (21b, 22b), (21c, 22c), (21d, 22d). FIG. 2 of *Verhoest* shows that rollers and coupling means (21d, 22d, 23d) attached to one support 25d is not substantially parallel to the rollers and coupling means (21c, 22c, 23c) attached to the support 25c next to it. Accordingly, *Verhoest* fails to teach or suggest at least "elongated support units, each has a bottom surface supported by said support structure, wherein said units are positioned remote from and substantially parallel to each other," as recited in claim 1. (Emphasis added).

Moreover, for sake of argument, if the rollers and coupling means are not construed as being "elongated support units," then *Verhoest* fails to teach or suggest at least "wherein when the substrate is positioned on the top surfaces, said tensioning device is capable of tensioning the flexible substrate along a feed path of the substrate," as recited in claim 7, since *Verhoest* discloses that a flexible substrate is not positioned on top of a support 25a-25d.

Further, Applicants note that *Verhoest* has a static support 26 to which stands support 25 carrying rollers 22. The rollers 22 roll over a belt 14 on which the substrate rests. As such, the substrate is not in contact with the static support or rollers, and the support for the substrate is a dynamic one. It is noted that the belt is in constant movement. In contrast, the claim describes that the elongated support units are supported by a static support structure.

As a result, *Verhoest* does not teach or suggest at least all of the claimed features of claim 1. Therefore, claim 1 is not anticipated by *Verhoest*, and the rejection should be withdrawn for at least this reason alone.

**b. Claims 2-7 and 11-12**

Because independent claim 1 is allowable over the cited art of record, dependent claims 2-7 and 11-12 (which depend from independent claim 1) are allowable as a matter of law for at least the reason that dependent claims contain all the elements and features of independent claim 1. For at least this reason, the rejections of claims 2-7 and 11-12 should be withdrawn.

Additionally and notwithstanding the foregoing reasons for allowability of claims 2-7 and 11-12, these claims recite further features and/or combinations of features (as is apparent by examination of the claim itself) that are patentably distinct from the cited art of record.

For example, claim 2 recites "further comprising a digital printing device including a plurality of print heads, said support structure being configured so as to provide one said flat region for each of said printing heads." In making the rejection of claim 1, the Office Action indicates that the support frame 26 may be construed as the claimed "support structure." However, *Verhoest* fails to teach or suggest that the support frame 26 is configured "so as to provide one said flat region for each of said printing heads." For at least this reason, claim 2 is not anticipated by *Verhoest*.

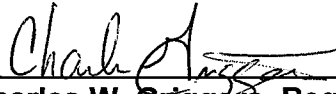
As an additional example, among others, claim 5 recites "wherein said print heads are positioned such that when said flexible substrate is placed upon said support structure, portions of said flexible substrate that are stretched between said support units are located below said print heads." However, *Verhoest* fails to teach or suggest that a flexible substrate is placed upon the support frame 26 (which has been construed as a "support structure" in the Office Action). For at least this reason, claim 5 is not anticipated by *Verhoest*.

Accordingly, the rejections to these claims should be withdrawn.

**CONCLUSION**

For at least the reasons set forth above, Applicant respectfully submits that all objections and/or rejections have been traversed, rendered moot, and/or accommodated, and that the pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned agent at (770) 933-9500.

Respectfully submitted,



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